

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 7
	)	
THE WORTH COLLECTION, LTD.,	)	Case No. 20-10337 (BLS)
	)	
<i>Debtor.</i>	)	Related to Docket No. 111

**CERTIFICATION OF NO OBJECTION WITH RESPECT TO CHAPTER 7 TRUSTEE’S  
MOTION FOR ENTRY OF ORDER: (I) AUTHORIZING THE SALE OF THE DEBTOR’S  
INTELLECTUAL PROPERTY IN ACCORDANCE WITH THE SALE DOCUMENTS;  
(II) APPROVING THE FORM AND MANNER OF UPSET BIDDING PROCEDURES; AND  
(III) GRANTING RELATED RELIEF**

Undersigned counsel for Douglas T. Tabachnik, as the Chapter 7 Trustee (the “*Trustee*”) of The Worth Collection, Ltd. (the “*Debtor*”), hereby certifies as follows:

1. On December 7, 2021, the Trustee filed the *Chapter 7 Trustee’s Motion for Entry of Order: (I) Authorizing the Sale of the Debtor’s Intellectual Property in Accordance with the Sale Documents; (II) Approving the Form and Manner of Upset Bidding Procedures; and (III) Granting Related Relief* [Docket No. 111] (the “*Motion*”).

2. Responses to the Motion were due by December 28, 2021 (extended to January 5, 2022 for the United States Trustee).

3. As of the date hereof, no answer, objection or other responsive pleading to the Motion were received by the undersigned. Further, the undersigned has reviewed the Court’s docket in these cases and no answer, objection or other responsive pleading to the Motion appears thereon.

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4. Accordingly, the Trustee requests that the order attached to the Motion be entered at the Court's earliest convenience.

Dated: January 8, 2022

GOLDSTEIN & MCCLINTOCK LLP

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